

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Southern Division**

VON MAURICE SUPER,

Plaintiff,

v.

**EXPERIAN INFORMATION SOLUTIONS,
INC., et al.,**

Defendants.

Case No.:

NOTICE OF REMOVAL

**TO: THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Pursuant 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Experian Information Solutions, Inc. (“Experian”), with the consent of Defendants Equifax, Inc. (“Equifax”) and TransUnion, LLC (“TransUnion” and collectively with Experian and Equifax, the “Defendants”), hereby removes this action from the District Court of Maryland for Montgomery County to the United States District Court for the District of Maryland. Removal is proper because this Court has subject matter jurisdiction over this action under federal question jurisdiction pursuant to 28 U.S.C. § 1331. Accordingly, Experian removes this action to this Court and states as follows.

I. INTRODUCTION

1. On October 5, 2023, Plaintiff Von Maurice Super (“Plaintiff”) filed a Complaint against Defendants in the District Court of Maryland for Montgomery County (“State Court”), styled *Von Maurice Super v. Experian Information Solutions, Inc., et al.*, Case No. D-06-CV-23-019842, seeking to recover undisclosed actual, punitive, and statutory damages under the Fair

Credit Reporting Act, 15 U.S.C. § 1681, *et seq.* (“FCRA”). A copy of the Complaint is attached hereto as **Exhibit A**.

2. Experian’s removal of this case is timely as Experian received service of Plaintiff’s complaint on November 1, 2023. Thus, this Notice of Removal is timely pursuant to 28 U.S.C. § 1446(b).

3. Equifax and TransUnion consent to this removal.

II. GROUND FOR REMOVAL

4. This case is removable pursuant to 28 U.S.C. §§ 1331 and 1367.

5. The Court has jurisdiction over the FCRA cause of action pursuant to 28 U.S.C. § 1331, as these federal claims arise under this Court’s original jurisdiction and are founded on a claim or right arising under the Constitution, treaties, or laws of the United States. *See Saunders v. Branch Banking & Trust Co.*, 526 F.3d 142, 147–48 (4th Cir. 2008).

III. VENUE

6. Venue is proper in this Court because this District encompasses the State Court, which is the forum from which the case has been removed. *See* 28 U.S.C. § 1441.

IV. NOTICE

7. Pursuant to 28 U.S.C. § 1446(d), and concurrent with filing this Notice of Removal, Experian will file a Notice of Filing Notice of Removal with the Clerk of the State Court and will attach a copy of this Notice of Removal thereto. A copy of the Notice of Filing Notice of Removal (without its exhibits) is attached hereto as **Exhibit B**.

8. Upon information and belief, the contents of Exhibits A-B constitute copies of all process and pleadings served upon Experian in the State Court Action pursuant to 28 U.S.C. § 1446(a).

9. Experian reserves the right to amend this Notice of Removal.

10. By removing the case to this Court, Experian does not waive any defenses, objections, or motions available to them under the applicable law.

WHEREFORE, having met all the requirements for removal under 28 U.S.C. §§ 1441 and 1446, including all the jurisdictional requirements of 28 U.S.C. § 1331 and 1367, Defendant Experian Information Solutions, Inc., with the consent of Defendants Equifax, Inc. and TransUnion, LLC, hereby removes this action from the District Court of Maryland for Montgomery County to the United States District Court for the District of Maryland and seeks whatever further relief this Court deems equitable and just.

Dated: November 29, 2023

**EXPERIAN INFORMATION SOLUTIONS,
INC.**

/s/ Elizabeth M. Briones

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*Counsel for Defendant Experian Information
Solutions, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2023, the foregoing was filed with the Court and served by operation of the Court's efilings system upon all counsel of record and a copy was sent by mail to:

Von Maurice Super
940 Thayer Avenue #7035
Silver Spring, MD 20910
Pro Se Plaintiff

/s/ Elizabeth M. Briones

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